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Additional counsel listed on signature page

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

IN RE: FACEBOOK, INC. CONSUMER
PRIVACY USER PROFILE LITIGATION

MDL No. 2843
Case No. 18-md-02843-VC

This document relates to:

ALL ACTIONS

**STIPULATION AND ~~PROPOSED~~
ORDER REGARDING PLAINTIFFS'
MOTION FOR EXPEDITED RELIEF
AND SANCTIONS FOR DEPOSITION
CONDUCT**

Judge: Hon. Vince Chhabria
Special Master Daniel Garrie, Esq.

JAMS REF. No. 1200058674

STIPULATION AND ~~PROPOSED~~ ORDER
REGARDING PLAINTIFFS' MOTION FOR
EXPEDITED RELIEF AND SANCTIONS
FOR DEPOSITION CONDUCT

MDL No. 2843
CASE No. 18-MD-02843-VC

By and through their undersigned counsel, Plaintiffs and Facebook, Inc. (collectively referred to as “the Parties”), hereby stipulate and agree as follows:

WHEREAS, on May 5, 2022, Plaintiffs conducted a deposition of Facebook, Inc. pursuant to Federal Rule of Civil Procedure 30(b)(6);

WHEREAS, on May 6, 2022, Plaintiffs submitted a Motion for Expedited Relief and Sanctions for Deposition Conduct (the “Motion”);

WHEREAS, the Parties have met and conferred and Plaintiffs have agreed to withdraw the pending Motion based on agreed future conduct;

IT IS HEREBY AGREED:

1. Plaintiffs are permitted seven additional hours of 30(b)(6) deposition testimony on the topics for which Ms. Allison Hendrix was designated to testify on behalf of Facebook at the May 5, 2022 deposition;
2. For future depositions:
 - A. At least a week in advance of each scheduled 30(b)(6) deposition, Facebook must provide, in writing, the scope of noticed discovery topics and limitations, as well as documents the witness will be prepared to testify about;
 - B. Objections are limited to form and single word or phrase objections in all depositions in this action, other than those on grounds of privilege;
 - C. No witness will be instructed not to answer on any ground other than privilege, to enforce a limitation ordered by the court, or to present a motion under Rule 30(b)(3);
 - D. Time spent arguing about objections will not count against testimony time;
 - E. Parties will litigate any disputes regarding scope prior to the 30(b)(6) depositions, and to the extent they are not, will litigate them after the deposition, such that the time reserved for the taking of testimony is not consumed by legal disputes about the scope of testimony.

3. Facebook will pay Plaintiffs' counsel \$31,311.00 for attorneys' fees for time spent preparing for and conducting the deposition, and \$6,000.00 as reimbursement for the Special Master's time spent on this deposition and this motion.
4. Facebook's agreement to abide by the terms of this Stipulation is in addition to the terms set forth in Special Master Daniel Garrie's May 8, 2022 order regarding conduct for future 30(b)(6) depositions.

Dated: May 17, 2022

Respectfully submitted,

KELLER ROHRBACK L.L.P.

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Derek W. Loeser

By: /s/ Lesley E. Weaver
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Attorneys for Defendant Facebook, Inc.

ATTESTATION PURSUANT TO CIVIL LOCAL RULE 5-1(h)(3)

I, Rosemarie T. Ring, attest that concurrence in the filing of this document has been obtained from the other signatories. I declare under penalty of perjury that the foregoing is true and correct.

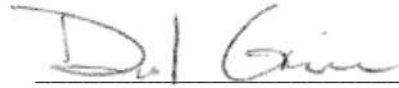
Executed this 17th day of May, 2022, at San Francisco, California.

/s/ Rosemarie T. Ring

Rosemarie T. Ring

PURSUANT TO STIPULATION, IT IS SO ORDERED.

Dated: May 20, 2022



Daniel Garrie
Discovery Special Master

4882-9895-2224, v. 1